

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

**IN RE: BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION**

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) **This Document Relates to:**
) Denise O'Neill
) **MDL Case No. MD-15-02641-DGC**
) **Civil Action No. 2:15-cv-1926-DGC**
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)

STIPULATION TO AMEND COMPLAINT

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs DENISE O'NEILL and GERALD O'NEILL and Defendant C.R. Bard, Inc., through their undersigned counsel, that Plaintiffs be allowed to amend their Complaint to include a claim for loss of consortium on behalf of GERALD O'NEILL in the above-captioned action.

Dated this 16th day of March, 2016

Respectfully submitted,

/s/ Matthew R. Lopez
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CERTIFICATE OF SERVICE

I hereby certify that, this 16th day of March, 2016, I have electronically filed a copy of the above and foregoing with Clerk of the Court using the ECF system, which sent notification of such filing to counsel of record.

/s/ Matthew R. Lopez